

Attachment 4.10 – Comprehensive System of Personnel Development (CSPD)

Washington DVR's response to Attachment 4.10 questions follow the question and are preceded by "DVR response."

(a) **Data system on personnel and personnel development**

Development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs and personnel development with respect to:

(1) Qualified personnel needs

- (A) The number of personnel who are employed by the state agency in the provision of vocational rehabilitation services in relation to the number of individuals served, broken down by personnel category;

DVR response: Washington DVR employs 321 personnel to serve approximately 11,700 individuals per year. Personnel providing VR services to individuals are employed in the following classifications:

Personnel Classification	Number of Personnel
VR Counselor 1	8
VR Counselor 2	60
VR Counselor 3	84
VR Counselor 4	2
Rehabilitation Technician 1	84
Rehabilitation Technician 2	13
VR Supervisor	22
Assistive Technology & Assessment Practitioner	3

- (B) The number of personnel currently needed by the state agency to provide vocational rehabilitation services, broken down by personnel category;

DVR response: Washington DVR currently needs to fill vacancies within the following personnel classifications in order to be at a full staffing level:

<i>Personnel Classification</i>	<i>Number of Current Vacant Positions</i>
<i>VR Counselor 1</i>	<i>2</i>
<i>VR Counselor 2</i>	<i>9</i>
<i>VR Counselor 3</i>	<i>8</i>
<i>VR Counselor 4</i>	<i>0</i>
<i>Rehabilitation Technician 1</i>	<i>4</i>
<i>Rehabilitation Technician 2</i>	<i>3</i>
<i>VR Supervisor</i>	<i>1</i>
<i>Assistive Technology & Assessment Practitioner</i>	<i>0</i>

- (C) Projections of the number of personnel, broken down by personnel category, who will be needed by the state agency to provide vocational rehabilitation services in the state in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

DVR response: Washington DVR projects a personnel attrition rate of approximately 10% per year over the next five years. It is projected over this period that approximately 12,000 individuals per year will be served. Based on these projections, it is anticipated the following number of positions will need to be filled during this period:

<i>Personnel Classification</i>	<i>Number of Projected Positions to be Filled Over Next 5 Years</i>
<i>VR Counselor 1</i>	<i>4</i>
<i>VR Counselor 2</i>	<i>30</i>
<i>VR Counselor 3</i>	<i>40</i>
<i>VR Counselor 4</i>	<i>0</i>
<i>Rehabilitation Technician 1</i>	<i>40</i>
<i>Rehabilitation Technician 2</i>	<i>6</i>
<i>VR Supervisor</i>	<i>12</i>
<i>Assistive Technology & Assessment Practitioner</i>	<i>2</i>

(2) Personnel development

- (A) A list of the institutions of higher education in the state that are preparing vocational rehabilitation professionals, by type of program:

DVR response: *Western Washington University is the only graduate program in the State of Washington that directly prepares vocational rehabilitation professionals.*

- (B) The number of students enrolled at each of those institutions, broken down by type of program:

DVR response: *Western Washington University presently enrolls 35 students per year in the Masters of Rehabilitation Counseling program.*

- (C) The number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.

DVR response: *In FFY 2009 Western Washington University's Rehab Counseling program graduated 21 students. All of these graduates hold the credentials for certification as a Rehabilitation Counselor.*

(b) Plan for recruitment, preparation, and retention of qualified personnel.

Develop, update on an annual basis, and implement a plan to address the current and projected needs for qualified personnel based on the data collection and analysis system described in paragraph (a) of this subsection. The plan provides for the coordination and facilitation of efforts between DVR and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified in accordance with paragraph (c) of this subsection, including personnel from minority backgrounds and personnel who are individuals with disabilities.

DVR response: *Washington DVR has well established recruitment linkages with the following institutions of higher education that offer Rehabilitation Counseling Programs:*

- ***Western Washington University***
- ***University of Idaho***
- ***Portland State University***
- ***Western Oregon University***
- ***San Diego State University***
- ***Fresno State University***
- ***Utah State University***

Washington DVR will concentrate its recruitment efforts on institutions in adjacent states. Recruitment announcements will continue to be sent nationally to institutions of higher education.

Recruitment of qualified candidates in sufficient numbers to fill Vocational Rehabilitation Counselor positions is a continuing challenge. The national shortage of qualified VRC applicants has significantly impacted DVR's ability to fill vacancies in a timely manner, especially in rural locations. To address this challenge, DVR has taken two steps:

- 1. When qualified VRC applicants are unavailable, DVR is recruiting applicants on an "in-training" basis. In these positions, applicants are hired as Rehabilitation Technicians and then provided the academic training and/or work experience to qualify for a VRC appointment. Once the VRC qualifications are attained, the individual is moved into a VRC position.***
- 2. The list of master's degrees that qualify for a VRC position has been modified to increase the number of qualified, master's level candidates available to compete for vocational rehabilitation counselor positions. The modified qualifications are:***

A master's degree in rehabilitation counseling, psychology, counseling, or a field related to vocational rehabilitation (such as one that promotes the physical, psychosocial, or vocational well-being of individuals with disabilities.

While DVR has broadened the qualifying master's degrees for a VRC position, the competencies that a VRC applicant is required to demonstrate have not been modified.

A particular focus of recruitment will be to attract candidates with Latino and American Indian backgrounds, since these are individuals who are presently under-represented among Washington DVR personnel. Targeted recruitment will continue to be conducted in collaboration with a wide range of Latino community-based organizations, African-American community based organizations, as well as American Indian VR Programs and other Tribal organizations.

(c) Personnel standards

Policies and procedures for the establishment and maintenance of personnel standards to ensure that DVR professional and paraprofessional personnel are appropriately and adequately prepared and trained, including:

- (1) Standards consistent with any national or state-approved or -recognized certification, licensing, registration, or, in the absence of these requirements, other comparable requirements (including state personnel requirements) that**

apply to the profession or discipline in which such personnel are providing vocational rehabilitation services.

DVR response: Washington DVR will continue applying state-based registration requirements as the basis for satisfying CSPD personnel standards. These requirements are maintained by the Washington State Department of Labor and Industries as registration standards for Vocational Rehabilitation Counselors.

All current Washington DVR counseling personnel (Field Services Administrator, Area Managers, VR Supervisors, and VR Counselors) hold credentials that are consistent with either the state-based VRC registration requirements or the national certification standards of the Commission on Rehabilitation Counselor Certification (CRCC).

Washington DVR will continue to apply minimum qualifications for new hires into VR Counselor and VR Supervisor positions that require the following credentials:

A master's degree in Rehabilitation Counseling, Psychology, Counseling, or a field related to vocational rehabilitation (such as one that promotes the physical, psychosocial, or vocational well-being of individuals with disabilities), or

CRCC Certification, or

A master's degree in a closely related field, plus 18-quarter (12-semester) credit hours in specified rehabilitation counseling courses at the graduate level.

- (2) To the extent that existing standards are not based on the highest requirements in the state applicable to a particular profession or discipline, the steps the state is currently taking and the steps the State Plans to take in accordance with the written plan to retrain or hire personnel within the designated state unit to meet standards that are based on the highest requirements in the state, including measures to notify designated state unit personnel, the institutions of higher education identified in subparagraph (a)(2), and other public agencies of these steps and the timelines for taking each step.

DVR response: This requirement is not applicable to Washington DVR since existing standards for all personnel are based on the highest requirements in Washington State.

- (3) The written plan required by subparagraph (c)(2) describes the following:
(A) Specific strategies for retraining, recruiting, and hiring personnel;

- (B) The specific time period by which all state unit personnel will meet the standards required by subparagraph (c)(1);
- (C) Procedures for evaluating the designated state unit's progress in hiring or retraining personnel to meet applicable personnel standards within the established time period; and
- (D) The identification of initial minimum qualifications that the designated state unit will require of newly hired personnel when the state unit is unable to hire new personnel who meet the established personnel standards and the identification of a plan for training such individuals to meet the applicable standards within the time period established for all state unit personnel to meet the established personnel standards.

DVR response: *This requirement is not applicable to Washington DVR since existing standards for all personnel are based on the highest requirements in Washington State.*

(d) Staff development.

Policies, procedures, and activities to ensure that all personnel employed by the designated state unit receive appropriate and adequate training. The narrative describes the following:

- (1) A system of staff development for professionals and paraprofessionals within the designated state unit, particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology.

DVR response: *Washington DVR annually completes a formal Performance and Development Plan (PDP) with each employee. The PDP is a standard tool used with all State of Washington employees to evaluate job performance and emphasize individualized staff development needs. Specific development and/or training needs are identified for each employee that should be addressed during the following year. In addition to determining individual employee training activities, these needs are compiled and used as a basis for planning overall training and developmental priorities to be conducted division-wide. While specific priorities vary year-to-year, a consistent theme continuously addresses the areas of assessment, VR counseling and vocational planning, job placement, as well as assistive and rehabilitation technology.*

In addition, Washington DVR requires all VR Counselors to participate in required in-service training on an ongoing basis that also covers these same topics. A "Rehabilitation Academy" is conducted for this purpose that features standard training modules. All VR Counselors participate in the Rehabilitation Academy as follows:

Basic Curriculum – required for all VR Counselors within six months of being hired.

Intermediate Curriculum – required for all VR Counselors between six and 18 months of being hired.

Advanced Curriculum – required for all VR Counselors who have been in their position 32 months or longer.

- (2) Procedures for the acquisition and dissemination to designated state unit professionals and paraprofessionals significant knowledge from research and other sources.

DVR response: Washington DVR regularly incorporates significant rehabilitation research findings and similar information related to advances in state-of-the-art VR practices in all facets of in-service training. In addition, Washington DVR actively collaborates with the Center for Continuing Education in Rehabilitation (CCER) which is the umbrella organization for TACE and serves on the TACE Board. This, combined with similar involvement with the Council of State Administrators for Vocational Rehabilitation (CSAVR) as well as University Affiliated Research and Training Centers, assures awareness and use of the most current research.

- (e) **Personnel to address individual communication needs.**

Availability of personnel within the designated state unit or obtaining the services of other individuals who are able to communicate in the native language of applicants or eligible individuals who have limited English speaking ability or in appropriate modes of communication with applicants or eligible individuals.

DVR response: Washington DVR assures full communication access for all individuals with limited English proficiency by contracting with appropriate spoken and written language interpreter and translation service providers. All forms and publications are available on a regular basis in the following languages: Cambodian, Chinese, Korean, Laotian, Russian, Spanish, and Vietnamese. Translations in other languages are provided as needed.

Individuals who are Deaf or Hard-of-Hearing may communicate with Washington DVR staff at all locations via TDD and/or voice relay service, and in some cases video relay. American Sign Language (ASL) Interpreters, real-time captioning, and/or augmentative listening devices are provided when needed for any in-person meeting or event.

Washington DVR also employs personnel in certain locations who are fluent in ASL and various other spoken languages.

- (f) **Coordination of personnel development under the Individuals with Disabilities Education Act**

Procedures and activities to coordinate the designated state unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.

DVR response: Washington DVR continues to work closely with the Office of Superintendent of Public Instruction (OSPI) to coordinate personnel development activities and has an interagency agreement with the Office of the Superintendent of Public Instruction to address mutual issues. This interagency agreement with OSPI is at the state level and sets general parameters for collaborative service delivery to students with disabilities. These activities are aimed at cross-training DVR and education personnel on service delivery methods and best practices that better assist students with disabilities in achieving employment outcomes after completing high school.